

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION

TSEPHANYAH Y. HAWKINS,
ET AL

V.

CASE NO.

1-05CV-184-C

U.S. DISTRICT COURT	
NORTHERN DISTRICT OF TEXAS	
ABILENE DIVISION	
DEC - 2 2005	
CLERK, U.S. DISTRICT COURT	
By	Deputy

THE HONORABLE JOHN WEEKS,
ET AL

ORIGINAL ANSWER OF DEFENDANT S.A.W. SOLUTIONS, INC.
SUBJECT TO PLEA TO THE JURISDICTION

TO THE HONORABLE JUDGE OF SAID COURT:

Now Comes S.A.W. Solutions, Inc., named as a Defendant in the above numbered and entitled cause, and, subject to its Plea to the Jurisdiction which is being filed concurrently with this answer, files this its Original Answer to the First Amended Complaint filed by the Plaintiffs, and would show the Court the following:

1. In response to Plaintiffs, allegations in Paragraphs 1-6 under the subheading "Jurisdiction and Venue," Defendant S.A.W. denies each and every allegation and asserts that Plaintiffs have no cause of action under the various federal statutes cited.

2. In response to Plaintiffs' allegations in Paragraphs 1-11, 13, and 20-28 under the subheading "Parties," Defendant S.A.W. has insufficient information to either admit or deny those allegations. As to Paragraph 12, Defendant S.A.W. admits those allegations except that it denies it engaged in the activities described at "all relevant times." Defendant S.A.W. was engaged in the described activities only from March, 2004, to November, 2004.

As to the allegations in Paragraphs 14-19, Defendant S.A.W. denies that Hutchison and Oster were its agents or employees. Hutchison and Oster were independent contractors engaged by Defendant S.A.W. Defendant has insufficient information to admit or deny the other allegations of these paragraphs.

3. In response to Plaintiffs' allegations in Paragraphs 29-121, Defendant S.A.W. answers that the allegations are not addressed to Defendant S.A.W. and therefore no answer is necessary. Generally, Defendant S.A.W. would also answer that it has insufficient information to either admit or deny the allegations in those paragraphs.

4. In response to Plaintiffs' allegations in Paragraph 122, Defendant S.A.W. denies that Hutchison and Oster engaged in the marketing and sales of pirated versions of CDS's software. Defendant S.A.W. also denies that Hutchison and Oster established and/or operated S.A.W and denies all the other allegations of Paragraph 122.

5. In response to Plaintiffs' allegations in Paragraphs 123-142, Defendant S.A.W. answers that the allegations are not addressed to Defendant S.A.W. and therefore no answer is necessary. Generally, Defendant S.A.W. would also answer that it has insufficient information to either admit or deny the allegations in those paragraphs.

6. In response to Plaintiffs' allegations in Paragraphs 143, Defendant S.A.W. denies those allegations except Defendant S.A.W. admits that Hutchison and Oster attended the 2004 National Verbatim Reporter's Association to market a product developed by them and financed by S.A.W. but denies that they sold any product.

7. In response to Plaintiffs' allegations in Paragraphs 144-310, Defendant S.A.W. answers that the allegations are not addressed to Defendant S.A.W. and therefore

no answer is necessary. Generally, Defendant S.A.W. would also answer that it has insufficient information to either admit or deny the allegations in those paragraphs.

8. In response to Plaintiffs' allegations in Paragraphs 311-352, Defendant S.A.W. denies those allegations.

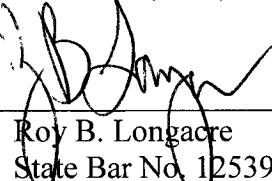
9. In response to Plaintiffs' allegations in Paragraphs 353-436, Defendant S.A.W. answers that the allegations are not addressed to Defendant S.A.W. and therefore no answer is necessary. Generally, Defendant S.A.W. would also answer that it has insufficient information to either admit or deny the allegations in those paragraphs.

WHEREFORE, PREMISES CONSIDERED, Defendant S.A.W. prays that the Plaintiffs take nothing, that Defendant S.A.W. be dismissed, that all costs be assessed against the Plaintiffs, and that Defendant be granted such other relief to which it may show itself justly entitled.

Respectfully submitted,

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By:


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CERTIFICATE OF SERVICE

I hereby certify that I have complied with Federal Rules of Civil Procedure by serving a true copy of the above instrument on all other parties or their attorneys.

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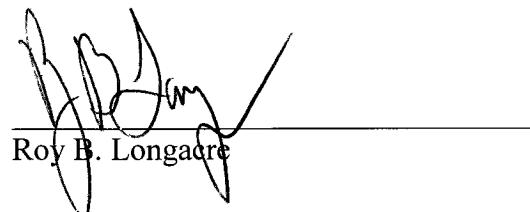
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